

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

**PC SCAN**

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**FILED**  
**2/5/2024**

SME

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

Adam Titus # R-43512.

(Enter above the full name  
of the plaintiff or plaintiffs in  
this action)

vs.

Case No: 1-23-CV-02036  
(To be supplied by the Clerk of this Court)

Placement officer Thornton

Warden Gomez

Maintenance Supervisor John/Jane Doe

Correctional officer John Doe #1

Correctional officer John Doe #2

Correctional officer John Doe #3 continued on page #1A

(Enter above the full name of ALL  
defendants in this action. Do not  
use "et al.")

**CHECK ONE ONLY:**

**AMENDED COMPLAINT**

☒

**COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983  
U.S. Code (state, county, or municipal defendants)**

☐

**COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE  
28 SECTION 1331 U.S. Code (federal defendants)**

☐

**OTHER (cite statute, if known)**

**BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR  
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.**

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

correctional officer John DOE #4  
correctional officer John DOE #5  
correctional officer Jane DOE #6  
correctional officer John DOE #7  
correctional officer John DOE #8  
correctional officer Jane DOE #9  
correctional officer John DOE #10  
correctional officer John DOE #11  
correctional officer Jane DOE #12  
correctional officer John DOE #13  
correctional officer John DOE #14  
correctional officer Jane DOE #15  
correctional officer John DOE #16  
correctional officer John DOE #17  
correctional officer John DOE #18  
correctional officer Jane DOE #19  
correctional officer Jane DOE #20  
correctional officer John DOE #21  
correctional officer John DOE #22  
correctional officer Jane DOE #23

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

**I. Plaintiff(s):**

- A. Name: Adam Titus
- B. List all aliases: none
- C. Prisoner identification number: #R-43512
- D. Place of present confinement: Stateville correctional center
- E. Address: P.O. box 112, Joliet, IL, 60434

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

**II. Defendant(s):**

(In A below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in B and C.)

- A. Defendant: correctional officer Thornton  
 Title: Placement  
 Place of Employment: Stateville corf center
- B. Defendant: correctional maintenance officer Supervisor <sup>Cplw/James Doe</sup>  
 Title: Maintenance supervisor  
 Place of Employment: Stateville corf center
- C. Defendant: Gomez  
 Title: Warden  
 Place of Employment: Stateville corf center

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

Continued on  
 Page 2A, 2B, 2C



D. Defendant: correctional officer John Doe #1  
Title: correctional officer  
Place of Employment: Stateville corr center

E. Defendant: correctional officer John Doe #2  
Title: correctional officer  
Place of Employment: Stateville corr center

F. Defendant: correctional officer Jane Doe #3  
Title: correctional officer  
Place of Employment: Stateville corr center

G. Defendant: correctional officer John Doe #4  
Title: correctional officer  
Place of Employment: Stateville corr center

H. Defendant: correctional officer John Doe #5  
Title: correctional officer  
Place of Employment: Stateville corr center

I. Defendant: correctional officer Jane Doe #6  
Title: correctional officer  
Place of Employment: Stateville corr center

J. Defendant: correctional officer John Doe #7  
Title: correctional officer  
Place of Employment: Stateville corr center

K. Defendant: correctional officer John Doe #8  
Title: correctional officer  
Place of Employment: Stateville corr center

L. Defendant: correctional officer Jane DOE #9  
Title: correctional officer  
Place of Employment: Stateville corr center

M. Defendant: correctional officer John DOE #10  
Title: correctional officer  
Place of Employment: Stateville corr center

N. Defendant: correctional officer John DOE #11  
Title: correctional officer  
Place of Employment: Stateville corr center

O. Defendant: correctional officer Jane DOE #12  
Title: correctional officer  
Place of Employment: Stateville corr center

P. Defendant: correctional officer John DOE #13  
Title: correctional officer  
Place of Employment: Stateville corr center

Q. Defendant: correctional officer John DOE #14  
Title: correctional officer  
Place of Employment: Stateville corr center

R. Defendant: correctional officer Jane DOE #15  
Title: correctional officer  
Place of Employment: Stateville corr center

S. Defendant: correctional officer John DOE #16  
Title: correctional officer  
Place of Employment: Stateville corr center



1. Defendant: correctional officer John Doe #17  
Title: correctional officer  
Place of Employment: Stateville corr center

U. Defendant: correctional officer John Doe #18  
Title: correctional officer  
Place of Employment: Stateville corr center

V. Defendant: correctional officer Jane Doe #19  
Title: correctional officer  
Place of Employment: Stateville corr center

W. Defendant: correctional officer Jane Doe #20  
Title: correctional officer  
Place of Employment: Stateville corr center

X. Defendant: correctional officer John Doe #21  
Title: correctional officer  
Place of Employment: Stateville corr center

Y. Defendant: correctional officer John Doe #22  
Title: correctional officer  
Place of Employment: Stateville corr center

Z. Defendant: correctional officer Jane Doe #23  
Title: correctional officer  
Place of Employment: Stateville corr center

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

**III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:**

- A. Name of case and docket number: Adam Titus v. Aaron Steit-Cox, Nicholas Bryan, Dustin Hager, Martin Matherly, Shawn Thrush, and David Underwood - 4:26 cv 04251
- B. Approximate date of filing lawsuit: November 22, 2016
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: N/A
- D. List all defendants: Aaron Steit-Cox, Nicholas Bryan, Dustin Hager, Martin Matherly, Shawn Thrush, and David Underwood
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): Central District
- F. Name of judge to whom case was assigned: Colin Stirling Bruce
- G. Basic claim made: Excessive force, failure to intervene, deliberate indifference.  
*continued on page 3A*
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): May 4, 2018, yes, no appeal, no.
- I. Approximate date of disposition: May 4, 2018  
*continued on page 3A  
3B-3m*

**IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.**

On June 9, 2016, Subjected him to Excessive Force failure to intervene and deliberate indifference. As Plaintiff asked C.O. Hodgeman if he could speak to an Supervising officer about the Extreme heat, and was denied then Hodgeman left and defendant Cox arrived and told Plaintiff to cuff up. Then the Plaintiff asked to speak to a lieutenant. Then Cox sprayed the Plaintiff in the face with a chemical agent then members of Tact team arrived slammed Plaintiff to the ground and began punching the Plaintiff even though the Plaintiff was in handcuffs and not combative.



A. name of case and docket number  
Plaintiff, Adam Litus  
Defendants, Klausshaar - 1:17-CV-01535

B. Approximate date of filing lawsuit: November 28, 2017

C. list all Plaintiffs: Adam Litus

D. list all Defendants: Klausshaar, Doctor Tilden, nurse  
Shawny, nurse Jane Doe #1, mental Health John Doe #1-8  
med-tech Jane Doe #1 et al.

E. court in which the lawsuit was filed (if federal  
court, name the district; if state court, name the county);  
central District

F. name of Judge to whom case was assigned:  
micheal m. nichols

G. Basic claim made: Excessive force, deliberate  
indifference, Plaintiff was being escorted by Defendant  
Klausshaar who was pushing Plaintiff as they walked  
when they reached the stairs Plaintiff asked Defendant  
Klausshaar to stop pushing him as he had extreme  
back pain, as Plaintiff was descending the stairs,  
Defendant pushed Plaintiff down the stairs, then  
Plaintiff was taken to healthcare where defendants  
nurse Shawna and nurse Jane Doe left Plaintiff  
to sit in pain and other defendant's "Jane and John  
Doe's" then Plaintiff was seen by defendant Dr. Tilden  
page 3B

Several Hours later and denied medical treatment and food as he was admitted to the Healthcare unit and kept from December 13 through 16, 2016. Then Plaintiff states that on December 16, 2016, C.O. John Doe came to Healthcare entered Plaintiff's cell and forced him to the ground. Then picked him up by the arms and dropped Plaintiff to the floor.

H. Disposition of this case was the case dismissed? was it appealed? is it still pending? Still pending, then it was dismissed.

I. Approximate date of disposition: ~~was~~ 1-14-20



A. Name of case and docket number  
Plaintiff, Adam Titus  
Defendants, Jacob A. McDonald,  
4-17-CV-04004

B. Approximate date of filing lawsuit: January 9, 2017

C. List all Plaintiffs: Adam Titus

D. List all Defendants: Jacob A. McDonald, Corey Smith

E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county); Central district

F. Name of Judge to whom case was assigned:  
Sue E. Myerscough

G. Basic claim made: Excessive force, deliberate indifference, failure to intervene Plaintiff was escorted by defendants to his cell, as Plaintiff entered the cell Defendant McDonald shoved Plaintiff to the floor by grabbing him by the back of the neck. Then both Defendant Denied Plaintiff medical treatment after Plaintiff requests and failure to intervene on Defendant Smith.

H. Disposition of this case was the case dismissed? was it appealed? is it still pending? Still pending.



L. Approximate date of disposition: n/a

A. name of case and docket number  
Plaintiff Adam Titus  
Defendants, Kyle Kent  
1:17-cv-01249

B. Approximate date of filing lawsuit: June 2, 2017

C. list all Plaintiff's: Adam Titus

D. list all Defendants: Kyle Kent, Sekayi Baptist,  
Shawna Joneson, Weston Gresham, Christopher Bibbaker,  
James Boland, Leo Smith, Terry Jahnsson, Heather Mary,  
Jodi Monroe Stenson Horton, Aaron Rhoades, Robert Snyder,  
Shelton Williams, Jod Newkirk, Brian Bibbs, Mental  
Health Jane Doe #1, Mental Health Jane Doe #2.

E. court in which the lawsuit was filed (if  
federal court, name the district; if state court  
name the county): central District

F. name of judge to whom case was assigned:  
Sue E. Myerscough

G. Basic claim made: Excessive Force, Deliberate  
indifference. Plaintiff states Defendant Kent on  
1-4-17 applied handcuffs tightly and then punched  
Plaintiff in the back while escorting Plaintiff down  
the stairs causing Plaintiff to fall. The Plaintiff  
was restrained on a bench for over seven hours  
as Plaintiff urinated and defecated on himself.  
The next day Plaintiff was denied his pain



medication by C.O. Mary.

H. Disposition of this case, was the case dismissed?  
was it appealed? is it still pending? > still pending

I. Approximate date of disposition: N/A



A. Name of case And docket number

Plaintiff, Adam Titus

Defendants, David Mitchell c.o. John Doe's #1-9

Mental Health Jane Doe #1, med-tech Jane Doe #1-3,

Sergeant John Doe #1, Wexford Health Services et. AL.

3:17-cv-01297

B. Approximate date of filing lawsuit: November 30, 2017

C. list all Plaintiffs: Adam Titus

D. list all Defendants: David Mitchell, c.o. John Doe's #1-9

mental Health Jane Doe #1, med-tech Jane Doe #1-3, Sergeant

John Doe #1, Wexford Health Services et. AL.

E. court in which the lawsuit was filed (if Federal court, name the district; if state court, name the county); Southern District

F. name of Judge to whom case was assigned; Nancy J. Rosenstengel

G. Basic claim made: Excessive force, deliberate indifference Plaintiff states that on June 16, 2017, Plaintiff was tackled by three prison guards John Doe's and slammed to the ground. Then Plaintiff was restrained and John Doe Defendants punched Plaintiff in the face, back repeatedly while covering the handcuffs while placing Plaintiff in a headlock and twisting Plaintiff's wrist. Then Lieutenant Mitchell walked up and kicked Plaintiff in the face and grabbed him by the leg and twisted



it. Then Plaintiff was taken to healthcare by C.O. John DOE as Plaintiff requested medical attention. Then Plaintiff was seen by nurses as a group of guards "C.O.'s" entered and began to punch and knee Plaintiff in the back, face and head. Then Plaintiff was dragged to the front of segregation as three prison guards kned and punched Plaintiff while calling Plaintiff derogatory names. Plaintiff was taken to the shower and requested medical attention to John DOE's C.O.'s. Then Plaintiff was placed in a cell as John DOE's C.O.'s took Plaintiff to med-tech's as Plaintiff tried to explain his injuries but was ignored. Then Plaintiff was taken to my cell while C.O.'s twisted Plaintiff's wrist and Plaintiff requested medical treatment.

H. Disposition of this case, was the case dismissed? was it appealed? is it still pending?  
Still pending

I. approximate date of disposition: N/A



A. name of case And docket number  
Plaintiff, Adam litus  
Defendants, melvin.  
1:18-cv-01094

B. Approximate date of filing lawsuit: march 5, 2018

C. list all Plaintiffs: Adam litus

D. list all Defendants: melvin, Steven mead,  
TRT John Doe, et. AL

E. court in which the lawsuit was filed (if  
federal court, name the district; if state court,  
name the county); central district

F. name of Judge to whom case was assigned:  
James E. Shaddid

G. On June 16, 2017 Plaintiff was transferred and subjected  
to excessive force, and cruel and unusual punishment  
by Pontiac correctional center officers as he was  
transported, and was forced into a small metal box  
on top of two other inmates plaintiff complained  
and his complaints were ignored as the TRT officers  
taunted, harassed and drove recklessly in the van  
causing fear on plaintiff physically as he was  
being tossed around in the box of the van, as well  
as the restraints while on flight, then on June 17, 2017  
plaintiff arrived at Pontiac correctional center



And tried to explain his injuries and was ignored  
then Plaintiff was escorted by TBI mead, as he twisted on  
Plaintiff's handcuffs causing pain on Plaintiff as Plaintiff  
stumbled, next Plaintiff entered the cell and then  
TBI mead slammed Plaintiff's face into the ground  
before he exited the cell. Plaintiff requested  
medical attention. Plaintiff sustained physical  
injuries and mental.

H. Disposition of this case, was the case  
dismissed? was it appealed? if it still  
pending? went to trial and was dismissed  
Plaintiff is appealing and denied

I. Approximate date of disposition? June 8, 2022



A. name of case and docket number

Plaintiff, Adam Titus

Defendants, DOE's 10-20 et AL - 3:17-cv-01315

B. Approximate date of filing lawsuit:

C. List all Plaintiffs: Adam Titus

D. List all Defendants: DOE's 10-20, Major Westfall, C.O. Cason, C.O. Weaver, C.O. Webb, Lieutenant Samuels,

E. court in which the lawsuit was filed (if federal court name the district; if state court, name the county); southern District

F. name of judge to whom case was assigned: Gilbert C. Sison

G. Basic claim made: Harassment and threats, on April 5, 2017, Plaintiff was transferred to menard. Plaintiff wore an black and white striped jumpsuit, while other inmates had on yellow jumpsuits. As Plaintiff was getting off the bus, C.O. John DOE #10 stated to C.O. John DOE #11, 12, 13, 14, and 15 "we got a stifer." As Plaintiff walked toward these guards they got in his face and told him, "this is menard, we going to beat your ass down here." C.O. John DOE #10 they told another officer to "stamp his brains out," if Plaintiff touch and did anything. On April 10, 2017, when Plaintiff was let out to chew, C.O. John DOE #16, 17, 18, 19, 20 were standing amongst the stifer blocking the exit.

As Plaintiff walked toward the prison guards, they harassed him called him derogatory names and threatened him with physical harm due to his being a black male.

H. Disposition of this case was the case dismissed? was it appealed? is it still pending? settled out

I. Approximate date of disposition: 10-14-21



A. name of case and docket number Adam Titus v. John/Jane DOE's  
Plaintiff: Adam Titus  
Defendants: John / Jane DOE's  
NO. 23-CV-05544

B. approximate date of filing lawsuit: August 13, 2023

C. list all Plaintiffs: Adam Titus

D. list all Defendants: Nurse Jane/John DOE's etc  
correctional officer's John/Jane DOE's etc, lieutenant John/Jane DOE's etc  
E. court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): northern District

F. name of judge to whom case was assigned:  
Judge Kness

G. Basic claim made: conditions of confinement  
between June 12, 2021 and July 5, 2021, hot  
temperatures in cell house, windows were double  
paned glass windows which increased the hot temperatures  
and the windows were nailed shut in Edward  
house and in other cellhouse had modernized  
circular fans and Edward house did not and  
E-house had an infestation of Roaches, flies and  
other vermin and dust that filled the air  
as well as brown sink water as plaintiff was  
double celled for up to 24 hours a day. Plaintiff  
complained to prison staff and wrote letters  
with no results.

H. Disposition of this case was the case dismissed?  
was it appealed? is it still pending? Initial  
stages of complaint.

I. approximate date of disposition: N/A



A. name of case and docket number Adam Titus v. Mead  
Plaintiff: Adam Titus 1:23-cv-05656  
Defendants: Mead et. AL

B. Approximate date of filing lawsuit: August 18, 2023

C. List all Plaintiffs: Adam Titus

D. List all Defendants: Mead et. AL

E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): Northern District

F. name of judge to whom case was assigned:

G. Basic claim made: ~~retaliation~~ pro se plaintiff was retaliated against by (FBI Mead) in an OIG shake down and Mead destroyed plaintiff's legal papers that included Plaintiff's lawsuit against Mead, on September 30, 2021.

H. Disposition of this case, Initial stages of complaint.

I. Approximate date of disposition: n/A



[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

#### IV. Statement of Claim:

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. **Do not give any legal arguments or cite any cases or statutes.** If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

All Defendants named John And Jane DOE'S are the Illinois Department of corrections Employees Assigned to the stateville correctional center, The John And Jane DOE'S are defendants who refuses to wear their Identification cards as required preventing prisoners to know their names to file Grievances, Etc.

This is a civil rights complaint under 42 USC 1983 filed by the Plaintiff Adam Titus #R-43512, pro se. A state of Illinois Prisoner states his united states constitution rights were violated and a deprivation under the 8<sup>th</sup> Amendment where Prison officials failed to protect Plaintiff health and safety, where his conditions of confinement was not humane subjecting Plaintiff to an condemned cell with a non-operable toilet and sink, as the toilet completely did not flush and the button did not work and had no pressure and small drips came out when the buttons were pushed, it was inoperable, and Plaintiff was denied any alternative to use the bathroom or have drinking water, as plaintiff remained in cell for

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

up to 24 hours each day with no other access to toilet and sink water. Plaintiff suffered from stomach pain, headaches, blurred vision, dizziness, nausea, vomiting, breathing issues resulting in cruel and unusual punishment as Plaintiff had to stay in that cell up to 24 hours, because defendants refuse to move Plaintiff to an adequate living and working cell. Plaintiff have serious health issues stemming from these conditions of inhumane living conditions, defendants have demonstrated they do not care for Plaintiff's life, health or safety, where defendants all have the authority to move plaintiff to an adequate cell or allow him out take or have access to an toilet or water. Thus the conditions of confinement at stateville correctional center, subjected Plaintiff to torture, cruel and unusual punishment and inhumane conditions. Defendants, ignored plaintiff's complaints and taken no corrective action, to which make defendants also deliberately indifferent and held liable as the acts of the defendants harmed plaintiff. Defendants showed that they didn't care about Plaintiff's life because he was in Prison.



## Facts Common to All counts

1. On April 8, 9, 10, 11, 12, 13 of 2021, while at stateville correctional center, Plaintiff was subjected to an Eighth Amendment violation cruel and unusual punishment and deliberate indifference to Plaintiff's living conditions.
2. Plaintiff was placed in "Edward house" in cell #7, 02, Plaintiff toilet and sink was completely shut off and did not work at all as Plaintiff tried to flush the toilet the button did not work.
3. As Plaintiff tried to push the hot and cold water buttons each button did not work and the water from the sink came out in small drips and the toilet had feces and urine in it, that gave the cell an feces and urine smelled odor.
4. After noticing the cell conditions, Plaintiff called correctional officers John DOE #1, John DOE #2, Jane DOE #3, John DOE #4, John DOE #5, John DOE #6 and Jane DOE #7, on April 8, 2021, then John DOE #8, John DOE #9, Jane DOE #10, and John DOE #11 on April 9, 2021, then Jane DOE #12, John DOE #13, John DOE #14, Jane DOE #15, on April 10, 2021, then John DOE #16, John DOE #17, John DOE #18, Jane DOE #19, Jane DOE #20, John DOE #21, on April 11, 2021, then John DOE #22, Jane DOE #23 on April 12, and 13<sup>th</sup> of 2021.

5. Plaintiff then explained to correctional officers that his toilet completely did not work or neither flushed or had any pressure coming from the button as well as the hot and cold water buttons from the sink did not work.
6. In further, Plaintiff complained of the feces and urine smell that filled the cell from the inoperable toilet.
7. Due to the inhumane conditions, Plaintiff suffered from headaches, stomach pains, dizziness, blurred vision and nauseated, vomiting, breathing issues.
8. Plaintiff further complained of needing to use the bathroom and a working sink and Plaintiff was denied by John and Jane DOE<sup>#1-23</sup>.
9. Next Plaintiff asked for an supervisor or to call maintenance and have it fixed or have Plaintiff moved to an adequate working cell and correctional officers John and Jane DOE<sup>#1-23</sup> stated "Welcome to E-house" they fix it when they want, and they will not move you.
10. Plaintiff wrote letters to the Placement officer Thornton, maintenance supervisor John/Jane DOE and Warden Gomez and asked each prison official to be moved. Plaintiff never received a response neither his conditions changed as Plaintiff was subjected to these conditions up to 24 hours each day.



## Count 1 - Civil And Unusual Punishment

11. Plaintiff re-alleges the allegations in paragraphs 1-10 of the "facts common to all counts".

12. as a citizen of the United States, Plaintiff has a right under the constitution to be free from civil and unusual punishment.

13. correctional officers, defendants, including but not limited to correctional officers John and Jane DOE # 1-23, And Placement officer Thornton, maintenance supervisor John/Jane DOE, And Warden Gomez, Defendants all acted under the color of state law to deprive Plaintiff of his constitutional right of freedom from civil and unusual punishment in more or more of the following ways:

A. Subjecting Plaintiff to an Inhumane cell with an Inoperable toilet And sink.

B. Subjecting Plaintiff to an Inhumane living condition as feces and urine filled the toilet And Plaintiff had to Inhale the foul odor each day up to 24 hours

C. Subjecting Plaintiff to an Inhumane cell for up to 24 hours each day without use of the toilet or sink.

D. Subjecting Plaintiff to an Inhumane cell with no other way to use or have access to a toilet or sink

E. Subjecting Plaintiff to an Inhumane cell with no other way to use a sink or have access to water.

14. Correctional officers, Defendant's John And Jane DOE's #1-23 And Defendant's Placement officer Thornton, maintenance supervisor John/Jane DOE And Warden Gomez acted in their individual and official capacity and are personally responsible for their actions, And liable for failure to act for known or obvious conditions as well as failure to train or supervise or to respond to evidence of misconduct, and are officially responsible for the acts of officers.

15. Correctional officers, Defendants John And Jane DOE's #1-23 And Defendant's Placement officer Thornton, maintenance supervisor, John/Jane DOE And Warden Gomez, Defendant's acted maliciously And wantonly to inflict pain upon plaintiff.

16. as a direct and proximate result of the actions of correctional officers, Defendant's correctional officers John And Jane DOE's #1-23 And Defendant's Placement officer Thornton, maintenance supervisor John/Jane DOE And Warden Gomez, Defendant's Plaintiff has suffered Physical, mental And emotional damages.

17. As a direct and proximate result of correctional officer's Defendant's, correctional officer's John And Jane DOE's #1-23, And Defendant's Placement officer Thornton, maintenance supervisor John/Jane DOE And Warden Gomez, Defendant's actions Plaintiff has suffered and continues to suffer injuries.



18. as a direct and proximate result of correctional officers, Defendants correctional officers John And Jane Doe's #1-23, And Defendant's Placement officer Thornton, maintenance supervisor John/Jane Doe And warden Gomez, Defendants actions, Plaintiff has had his constitutional rights violated.

Wherefore, Plaintiff Adam litus respectfully requests monetary damages and any other relief the court deems fair and justified to compensate Plaintiff for the violation of his constitutional rights and the injuries that he suffered at the hands of Defendants in violation of the Eighth and fourteenth Amendments of the United States Constitution.

### Count 2 - Cruel And Unusual Punishment Deliberate Indifference

19. Plaintiff re-alleges the allegations from paragraphs 1-10 of the "facts common to all counts"

20. as a citizen of the United States, Plaintiff has a right to be free from cruel and unusual punishment.

21. Plaintiff suffered a series of objectively serious physical and mental, emotional injuries during the inhumane conditions, such as stomach pains, headaches, dizziness, blurred vision, breathing pains and vomiting.

22. Correctional officers Defendants correctional officers John And Jane Doe's #1-23, And Defendant's Placement officer Thornton, maintenance supervisor John/Jane Doe

and warden Gomer all acted under the color of state law to deprive Plaintiff of his constitutional right of freedom from cruel and unusual punishment in more or more of the following ways:

A. Ignoring Plaintiff's request to use the bathroom and sink.

B. Ignoring Plaintiff's request to be moved or have the toilet and sink fixed.

C. Ignoring Plaintiff's letters to be moved as it caused physical and mental injuries.

D. Ignoring Plaintiff's letters of repeated cries for help to be moved or have it fixed by attempt of notice.

E. Ignoring Plaintiff's letters of repeated cries for help and the physical and mental injuries he suffered by each day.

F. Refusing to move Plaintiff or remedy the situation in any way.

G. Failing to establish appropriate procedures for aiding an inmate in serious inhumane living conditions.

H. Failing to instruct IDOC employees to recognize when an inmate is in inhumane living conditions and is suffering with physical and mental injuries from those conditions and remedy it.

I. Failing to hold supervisory role of knowledge of present conditions or remedy it.



[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

**V. Relief:**

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.


Plaintiff Respectfully Demands Trial by Jury  
 A. Compensatory damages determined by trier of facts  
 B. Punitive damages determined by trier of facts  
 C. Such injunctive declaratory or other relief as this  
 Court deems just and proper.

VI. The plaintiff demands that the case be tried by a jury. ☒ YES ☐ NO

**CERTIFICATION**

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this 4 day of Feb, 2024

  
 (Signature of plaintiff or plaintiffs)

Adam Titus  
 (Print name)

R-43512  
 (I.D. Number)

Western Illinois Car Center  
Mount Sterling, IL

62353  
 (Address)

Grievances &  
ARB Responses

Ex<sup>1's</sup> A-G



RECEIVED  
STATEVILLE C.C.  
JUN 23 2021

igned Grievance Institution: *EX 1A*

Housing Unit: *W-70* Bed #: *208*

Lvl rec: *ILLINOIS DEPARTMENT OF CORRECTIONS*  
**Offender's Grievance**

2nd Lvl rec:

to: GRIEVANCE DEPARTMENT (Please print): *BY: -21 Adam Titus* ID #: *R-43512* Race (optional): *BLK*

resent Facility: *Stateville Corr center* Facility where grievance issue occurred: *Stateville Corr center*

ture of grievance:

☐ Personal Property ☐ Mail Handling ☐ Medical Treatment ☐ ADA Disability Accommodation

☒ Staff Conduct ☐ Dietary ☐ HIPAA ☐ Restoration of Sentence Credit

☐ Transfer Denial by Facility ☒ Other (specify): *conditions of confinement etc.*

☐ Disciplinary Report

Date of report: \_\_\_\_\_ Facility where issued: \_\_\_\_\_

RECEIVED  
STATEVILLE C.C.  
JUN 23 2021

BY: GRIEVANCE DEPARTMENT

Note: Protective Custody Denials may be grieved immediately via the local administration on the protective custody status notification.

Complete: Attach a copy of any pertinent document (such as a Disciplinary Report, Search Record, etc.) and place in the designated labeled receptacle marked "grievance":

Counselor, unless the issue involves discipline, is deemed an emergency, or is subject to review by the Administrative Review Board Grievance Officer, only if the issue involves discipline at the present facility or issue not resolved by Counselor Chief Administrative Officer, only if EMERGENCY grievance.  
Mail to Administrative Review Board, only if the issue involves protective custody, involuntary administration of psychotropic drugs, issues from another facility except medical and personal property issues, or issues not resolved by the Chief Administrative Officer.

Summary of Grievance (Provide information including a description of what happened, when and where it happened, and the name or identifying information for each person involved):

On the date of April 8, 2021, Grievant resided in Edward house "A.K.A" (E-house) in cell #702, upon residing in that cell Grievant toilet did not work at all as it did not flush, and the water pressure from the sink was insufficiently low and came out in small drips, and the toilet had feces and urine in it and gave the cell an foul odor. Grievant complained to various staff/C.O.'s about the cell conditions and were asking to be moved as I

☒ Continued on reverse

Relief Requested:  
*Actions at a later date.*

Check only if this is an EMERGENCY grievance due to a substantial risk of imminent personal injury or other serious or irreparable harm to self.

Check if this is NOT an emergency grievance.

Offender's Signature

*R-43512*

Date

*6-9-21*

(Continue on reverse side if necessary)

Counselor's Response (if applicable) Date Received: *6/25/21* ☐ Send directly to Grievance Officer

Outside jurisdiction of this facility. Send to: Administrative Review Board, PO Box 19277, Springfield, IL 62794-9277

Response:

Per, Chief Engineers office, they have not received any recent work orders. Grievant has moved out of Edward 702 on 7/5/21. The current individuals in custody living in cell Edward 702 have not mentioned any toilet issues to this counselor.

Print Counselor's Name

Sign Counselor's Name

Date

as to offender: If you disagree with the counselor's response, it is your responsibility to forward grievance with counselor's response to the grievance officer.

EMERGENCY REVIEW: Date Received: \_\_\_\_\_

is determined to be of an emergency nature:

Yes, expedite emergency grievance

No, an emergency is not substantiated. Offender should submit this grievance according to standard grievance procedure

Chief Administrative Officer's Signature

Date

level being told that "welcome to E-house" they fix it  
when they want and that they will not move you. Gervant  
then wrote to the placement office to be moved and never  
got my response (see copy of letter EX-1) Gervant also wrote  
to the maintenance supervisor (see copy of letter EX-2) and never  
of letter EX-3) and never received his response. Gervant complained  
to six correctional staff (1) male, 5'8, 190, black hair, (2) male,  
5'9, 197, bald head, (3) female, 5'6, 185, black hair, (4) male,  
(5) male, 5'8, 190, black hair, (6) male, 5'8, 195, black hair, (7) male, 5'9, 190, black hair.  
On the date of April 9, 2001 Gervant again complained about  
his toilet not flushing or working and the feces and urine inside  
the toilet and the small foul odor as well as the sink having  
insufficiently low water pressure coming out in drops. Gervant  
complained to maintenance staff (1) male, 5'7, 160, bald head, (2) male,  
5'8, 160, black hair, (3) female, 5'9, 175, black hair, (4) male, 5'9, 175,  
black hair, and was told by all staff (They do what they want.  
Have no idea, Gervant asked to be moved and was denied. Gervant  
wrote to (placement office, maintenance supervisor and  
Gervant wrote to (placement office, maintenance supervisor and  
in response.

On the date of April 10, 2001 Gervant again complained about  
his toilet not flushing or working and the feces and urine inside  
the toilet and the small foul odor as well as the sink having  
insufficiently low water pressure coming out in drops. Gervant  
complained to maintenance staff (1) female, 5'6, 155, black hair,  
(2) male, 5'9, 190, black hair, (3) male, 5'8, 180, dark hair, (4) female, 5'9, 190, bald head, (5) male, 5'9, 190, bald head, (6) male, 5'9, 190, bald head, (7) male, 5'9, 190, bald head, (8) male, 5'9, 190, bald head, (9) male, 5'9, 190, bald head, (10) male, 5'9, 190, bald head, (11) male, 5'9, 190, bald head, (12) male, 5'9, 190, bald head, (13) male, 5'9, 190, bald head, (14) male, 5'9, 190, bald head, (15) male, 5'9, 190, bald head, (16) male, 5'9, 190, bald head, (17) male, 5'9, 190, bald head, (18) male, 5'9, 190, bald head, (19) male, 5'9, 190, bald head, (20) male, 5'9, 190, bald head, (21) male, 5'9, 190, bald head, (22) male, 5'9, 190, bald head, (23) male, 5'9, 190, bald head, (24) male, 5'9, 190, bald head, (25) male, 5'9, 190, bald head, (26) male, 5'9, 190, bald head, (27) male, 5'9, 190, bald head, (28) male, 5'9, 190, bald head, (29) male, 5'9, 190, bald head, (30) male, 5'9, 190, bald head, (31) male, 5'9, 190, bald head, (32) male, 5'9, 190, bald head, (33) male, 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RECEIVED STATEVILLE C.C. JUN 23 2021		D-952 Housing Unit: <u>2</u> Bed #: <u>20</u>	
ILLINOIS DEPARTMENT OF CORRECTIONS Offender's Grievance		2nd Lvl rec:	
GRIEVANCE DECISION (please print): BY: <u>Adrian Titus</u>		ID #: <u>R-43512</u>	Race (optional): <u>BLK</u>
Present Facility: <u>Stateville Corr Center</u>		Facility where grievance issue occurred: <u>Stateville Corr Center</u>	
Nature of grievance: <input type="checkbox"/> Personal Property <input type="checkbox"/> Mail Handling <input type="checkbox"/> Medical Treatment <input type="checkbox"/> ADA Disability Accommodation <input checked="" type="checkbox"/> Staff Conduct <input type="checkbox"/> Dietary <input type="checkbox"/> HIPAA <input type="checkbox"/> Restoration of Sentence Credit <input type="checkbox"/> Transfer Denial by Facility <input checked="" type="checkbox"/> Other (specify): <u>conditions of confinement etc.</u> <input type="checkbox"/> Disciplinary Report			
Date of report		Facility where issued	

Note: Protective Custody Denials may be grieved immediately via the local administration on the protective custody status notification.

Complete: Attach a copy of any pertinent document (such as a Disciplinary Report, Search Record, etc.) and place in the designated marked receptacle marked "grievance".

Counselor, unless the issue involves discipline, is deemed an emergency, or is subject to review by the Administrative Review Board Grievance Officer, only if the issue involves discipline at the present facility or issue not resolved by Counselor Chief Administrative Officer, only if EMERGENCY grievance

Mail to Administrative Review Board, only if the issue involves protective custody, involuntary administration of psychotropic drugs, issues from another facility except medical and personal property issues, or issues not resolved by the Chief Administrative Officer.

Summary of Grievance (Provide information including a description of what happened, when and where it happened, and the name or identifying information for each person involved):

On the date of April 8, 2021, Grievant resided in Edward house "A.K.A" (E-house) in cell #702, upon residing in that cell Grievant toilet did not work at all as it did not flush and the water pressure from the sink was insufficiently low and came out in small drips and the toilet had feces and urine in it and gave the cell a foul odor. Grievant complained to various staff/C.O.'s about the cell conditions and were asking to be moved as is.

☒ Continued on reverse

Relief Requested:

Actions at a later date.

☐ Check only if this is an EMERGENCY grievance due to a substantial risk of imminent personal injury or other serious or irreparable harm to self.

☐ Check if this is NOT an emergency grievance.

Offender's Signature

ID#

Date

(Continue on reverse side if necessary)

Counselor's Response (if applicable) Date Received: 6/25/21 ☐ Send directly to Grievance Officer

☐ Outside jurisdiction of this facility. Send to: Administrative Review Board, PO Box 19277, Springfield, IL 62764-9277

Response:

Per, Chief Engineers office, they have not received any recent work orders. Grievant has moved out of Edward 702 on 7/5/21. The current individuals in custody living in cell Edward 702 have not mentioned any toilet issues to this counselor.

Print Counselor's Name

Sign Counselor's Name

Date

Notes to offender: If you disagree with the counselor's response, it is your responsibility to forward grievance with counselor's response to the grievance officer.

EMERGENCY REVIEW: Date Received:

☐ This determined to be of an emergency nature:

☐ Yes, expedite emergency grievance

☐ No, an emergency is not substantiated. Offender should submit this grievance according to standard grievance procedure

Chief Administrative Officer's Signature

Date

ILLINOIS DEPARTMENT OF CORRECTIONS  
Offender's Grievance

1974

Assigned Grievance Institution:

Housing Unit

2nd Evt Rec

Bed #:



210

**State of Illinois - Department of Corrections**  
**Counseling Summary**

<b>IDOC #</b>	<b>R43512</b>	<b>Counseling Date</b>	<b>06/28/21 07:23:35:390</b>
<b>Offender Name</b>	<b>TITUS, ADAM</b>	<b>Type</b>	<b>Collateral</b>
<b>Current Admit Date</b>	<b>05/06/2005</b>	<b>Method</b>	<b>Grievance</b>
<b>MSR Date</b>	<b>12/23/2039</b>	<b>Location</b>	<b>STA GRIEVANCE OFFICER</b>
<b>HSE/GAL/CELL</b>	<b>E -07-02</b>	<b>Staff</b>	<b>GOMEZ, AMY, Correctional Counselor II</b>

---

RECEIPT OF GRIEVANCE ON 6/23/2020 CONCERNING CONDITIONS . THIS GRIEVANCE HAS BEEN ASSIGNED GRIEVANCE #951 AND WILL BE REVIEWED AND RESPONDED TO BY THE COUNSELOR.

EXD  
**State of Illinois - Department of Corrections**  
**Counseling Summary**

<b>IDOC #</b>	<b>R43512</b>	<b>Counseling Date</b>	10/03/21 08:30:36:697
<b>Offender Name</b>	<b>TITUS, ADAM</b>	<b>Type</b>	Collateral
<b>Current Admit Date</b>	05/06/2005	<b>Method</b>	Grievance
<b>MSR Date</b>	12/23/2039	<b>Location</b>	STA GRIEVANCE OFFICER
<b>HSE/GAL/CELL</b>	D -09-52	<b>Staff</b>	MCBEE, ANNA, Correctional Counselor II

---

GRIEVANCE #951 WAS RECEIVED ON \_10/1/21\_ BY THE GRIEVANCE OFFICE FOR REVIEW AND RESPONSE BY GRIEVANCE OFFICER.



E702  
D952

ILLINOIS DEPARTMENT OF CORRECTIONS  
RESPONSE TO OFFENDER'S GRIEVANCE

Grievance Officer's Report

Date Received: 10/01/2021 Date of Review: 01/05/2022 Grievance # (optional): 951  
Offender: Adam Titus ID#: R43512

Nature of Grievance:  
Conditions

Facts Reviewed:

Grievant claims on a grievance written 6/9/21 that while in E702, his toilet did not work and he has low water pressure.

Grievance Officer finds according to Counselor Scott, according to the Chief Engineer's Office, no work orders were received for the above issue. Grievant was moved out of the cell on 7/5/21. The current residents of the cell have not mentioned any issues with the toilet to the him (Counselor Scott).

Recommendation:

Grievance is MOOT.

Anna McBee

Print Grievance Officer's Name

Grievance Officer's Signature

(Attach a copy of Offender's Grievance, including counselor's response if applicable)

Chief Administrative Officer's Response

Date Received: 1/18/22 ☒ I concur ☐ I do not concur ☐ Remand

Action Taken:

Chief Administrative Officer's Signature

Date

Offender's Appeal To The Director

I am appealing the Chief Administrative Officer's decision to the Director. I understand this appeal must, within 30 days after the date of the Chief Administrative Officer's decision, be received by the Administrative Review Board, P.O. Box 19277, Springfield, IL 62794-9277. (Attach a complete copy of the original grievance, including the counselor's response if applicable, and any pertinent documents.)

Offender's Signature

ID#

Date

*EXIT*

Inmate Id:	R43512	Ret Form Ind:	
Name:	TITUS, ADAM	Modify Ind:	
Chair Code:	SHBE	Deny Ind:	
Grv Type:	L	Favorable Ind:	
Grv Code:	CONDITIONS	Deferred Ind:	
Receive Date:	01/21/2022	Moot Ind:	
Hearing Date:	00/00/0000	Grievance Number:	951
Mailing Date:	00/00/0000	Incident Number:	
Grv Loc:	STATEVILLE CC	Incident Date:	00/00/0000
Hearing Loc:	STATEVILLE CC	Incident Inst:	
		Date Received:	01/24/2022
Comments:	GRV #951 ALLEGES TOILET DID NOT WORK AND LOW WATER PRESSURE (4/8/21 - CELL 702 E-HOUSE)		



J.B. Pritzker  
Governor



Rob Jeffreys  
Director

### The Illinois Department of Corrections

1301 Concordia Court, P.O. Box 19277 • Springfield, IL 62794-9277 • (217) 558-2200 TDD: (800) 526-0844

Name: Titus, Adam

1/26/22

Date

ID#: R43512

Facility: Stateville

This is in response to your grievance received on 1/21/22. This office has determined the issue will be addressed without a formal hearing. A review of the Grievance, Grievance Officer/CAO response to the grievance has been conducted. For a grievance that is direct review by the ARB, a review of the Grievance has been conducted.

Your issue regarding: Grievance dated: 6/9/21 Grievance Number: 951 Griev Loc: STA

- ☐ Transfer denied by the Facility
- ☐ Dietary
- ☐ Personal Property
- ☐ Mailroom/Publications
- ☐ Assignment (job, cell)
- ☐ Commissary / Trust Fund
- ☒ Conditions (cell conditions, cleaning supplies, etc.) Cell 7:02, toilet issues 4/8/21
- ☐ Disciplinary Report: Dated: Incident #
- ☒ Other Claims reported issues with toilet several times throughout April

**Based on a review of all available information, this office has determined your grievance to be:**

- ☐ Affirmed, Warden is advised to provide a written response of corrective action to this office by
- ☐ Denied, in accordance with DR504F, this is an administrative decision.
- ☒ Denied, this office finds the issue was appropriately addressed by the facility Administration.
- ☐ Denied as the facility is following the procedures outlined in DR525.
- ☐ Denied as procedures were followed in accordance with DR 420 for removal/denial from/for an assignment.
- ☐ Denied as this office finds no violation of the grievant's due process in accordance with DR504.80 and DR504.30. This office is reasonably satisfied the offense cited in the report was committed.

☒ Other: These claims were not substantiated. Additionally, records reviewed by this office reflect you were seen "face to face" while in this cell (3/30/21 to 7/5/21) fourteen (14) times, with no toilet issues being stated.

FOR THE BOARD:

Sherry Benton  
Sherry Benton  
Administrative Review Board

CONCURRED:

Rob Jeffreys  
Rob Jeffreys  
Director

CC: Warden, Stateville Correctional Center  
Titus, Adam ID# R43512

*Mission: To serve justice in Illinois and increase public safety by promoting positive change for those in custody, operating successful reentry programs, and reducing victimization.*

[www.illinois.gov/idoc](http://www.illinois.gov/idoc)

Affidavits



## AFFIDAVIT

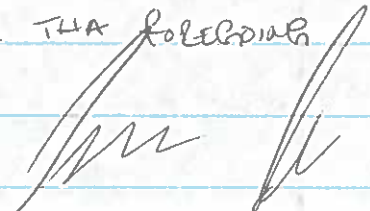
I, ERIC CARSON ID# M18899 ~~do~~ hereby DECLARE THAT I HAVE PERSONAL KNOWLEDGE OF THE FACTS SET FORTH HEREIN THAT I AM COMPETENT TO TESTIFY AND IF CALLED TO TESTIFY WOULD STATE AS FOLLOWS:

I, ERIC CARSON ID# M18899 RESIDED IN E-HOUSE AT STATEVILLE CORRECTIONAL CENTER IN CELL # 702 WITH MY CELLMATE ADAM TITUS ID# R43312 ON THE DATE OF APRIL 8, 2021 TO APRIL 14, 2021.

ADAM TITUS ID# R43312 AND I WERE IN CELL # 702 WITHOUT <sup>A</sup> WORKING TOILET, AND WATER PRESSURE<sup>IN</sup> (SINK) WAS INSUFFICIENTLY LOW.

WE BOTH TOLD C.O.'S (JOHN AND JANE DOE'S) ABOUT THE CELL CONDITIONS, AND NEEDING TO USE THE BATHROOM. WE WERE DENIED AS WE WERE IN THE CELL AND THE TOILET HAD FECES AND URINE IN THE TOILET AND GAVE THE CELL A Foul ODOR, AS WE WERE BEING DENIED TO <sup>BE</sup> ~~WANT~~ MOVED.

PURSUANT TO 28 U.S.C. 1746, I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA THAT FOREGOING IS TRUE AND CORRECT.



ID# M18899